

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

BHUPENDRA KHONA, JENNIFER  
LUDGATE, BRIAN MANN, and  
LUCIA LUONG Individually and On  
Behalf of a Class of Similarly Situated  
Individuals,

Plaintiffs,

v.

SUBARU OF AMERICA, INC.,

Defendant.

Case No.: 1:19-CV-09323-RMB - AMD

**PLAINTIFFS' UNOPPOSED  
APPLICATION FOR EXTENSION  
OF TIME FOR TO FILE MOTION  
FOR PRELIMINARY APPROVAL  
OF CLASS-ACTION SETTLEMENT**

Pursuant to L. Civ. R. 6.1, Plaintiffs Bhupendra Khona, Jennifer Ludgate, Brian Mann, and Lucia Luong ("Plaintiffs"), by and through the undersigned counsel, hereby apply for an order briefly extending the deadline for Plaintiffs to file their Motion for Preliminary Approval of Class-Action Settlement currently due to be filed by July 15, 2020. *See* ECF No. 35. In support thereof it is represented that:

1. Plaintiffs filed this class-action on April 5, 2019 [ECF No. 1], and Defendant Subaru of America, Inc. ("SOA") was served on April 11, 2019 [ECF No. 5].

2. On June 13, 2019, the parties filed a Joint Application informing the Court that they had reached a class-action settlement and requesting the previously scheduled settlement conference be vacated to enable the parties to complete the settlement documents and for Plaintiffs to prepare and file their Motion for Preliminary Approval of Class-Action Settlement. The Court granted this extension on June 14, 2019.

3. Since that time, the parties have continued to update the Court on the progress of confirmatory discovery and settlement papers, including by participating in several telephone conferences with the Court.

4. On June 11, 2020, following a telephonic status conference the Court set a deadline of July 15, 2020 for the filing of Plaintiffs' Motion for Preliminary Approval of Class-Action Settlement based upon the recommendation of counsel. *See* ECF No. 35. Following the Court's order, the parties have completed the Settlement Agreement which is currently out for signature, and Plaintiffs' have largely completed the preliminary approval papers. Plaintiffs' counsel desire a brief amount of additional time to confer with Plaintiffs and obtain the necessary signatures for the Settlement Agreement and to finalize the preliminary approval papers given the ongoing challenges presented by the COVID-19 pandemic which has required counsel to work from home with reduced in-office staff, and has slowed counsel's process to some degree.

5. In light of the above, Plaintiffs respectfully request that the deadline to file a Motion for Preliminary Approval be continued from July 15, 2020 to July 24, 2020.

6. SOA does not oppose this Application.

7. This Application is made prior to the expiration of the deadline sought to be extended.

Dated: July 13, 2020

By: /s/ Lee Albert

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**CONSENT ORDER**

The above application is ORDERED GRANTED. Plaintiffs' deadline to file a Motion for Preliminary Approval of Class-Action Settlement is Continued from July 15, 2020 to July 24, 2020.

ORDER DATED: July 14, 2020

By: 

Ann Marie Donio  
United States Magistrate Judge